IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE

| UNITED STATES OF AMERICA, |) | |
|---------------------------|---|------------------|
| Plaintiff |) | |
| |) | |
| VS. |) | No. 3:16-CR-20 |
| |) | (Collier/Guyton) |
| MARK HAZELWOOD et al., |) | |
| Defendant | Ì | |

MOTION REQUESTING MODIFICATION OF TERMS OF RELEASE

Mark Hazelwood, through counsel, moves this Honorable Court to amend the Order modifying the terms of release (Doc. 906) to permit Ty Bossey to substitute as third-party custodian only on December 5-6, 2019, in place of Asa Hazelwood.

Last week the Court granted Mr. Hazelwood's request to have Asa Hazelwood substitute as third-party custodian during his wife's travel from December 5-8, 2019. (Doc. 906).

As a Hazelwood has had a conflict arise that prohibits him from stepping in as third-party custodian on December 5, 2019. So that Mrs. Hazelwood's travel plans are not interrupted, we ask that Ty Bossey, a friend of Mr. Hazelwood, be permitted to step in as third-party custodian from December 5 - 6, 2019. As a Hazelwood will then step in as third-party custodian from December 6 - 8, 2019, as previously ordered. They will each be informed of their duties and will sign the bond conditions.

Counsel for the government was consulted and advised that the government defers to the discretion of the Court and the United States Probation Office. I have also spoken to Pretrial Services who defers to the Court.

WHEREFORE, Mr. Hazelwood requests that this Honorable Court enter an Order modifying the conditions of his release to allow Ty Bossey to substitute as third-party custodian from December 5-6, 2019, and Asa Hazelwood to substitute as third-party custodian from

December 6-8, 2019, as previously ordered.

DATED: Knoxville, Tennessee December 2, 2019

Respectfully submitted,

s/ Bradley L. Henry

Bradley L. Henry (TN Bar No. 025447)
Breeding Henry Baysan PC
900 S. Gay St.
Suite 1950
Knoxville, TN 37902
(865) 670-8535
bhenry@bhblegal.com

s/ Jim Walden

Walden Macht & Haran
One Battery Park Plaza
New York, New York 10004
(212) 335-2031
jwalden@wmhlaw.com

CERTIFICATE OF SERVICE

I hereby certify that, on December 2, 2019, a true and correct copy of the foregoing document was filed on CM/ECF with the U.S. District Court for the Eastern District of Tennessee. Notice of this filing was served on all CM/ECF parties.

/s/ Bradley L. Henry